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Superior Court Of California
County Of Los Angeles

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**Sherri R. Carter, Executive Officer/Clerk
By: Charlie L. Coleman, Deputy**

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No.:

BC 664704

Plaintiff,

vs.

EBENEZER BAPTIST CHURCH, a California Corporation; and DOES 1 through 50, inclusive,

Defendants.

COMPLAINT

COMPLAINT FOR ABATEMENT AND INJUNCTION

[HEALTH & SAF. CODE SECTION 11570, *ET SEQ.*; CIVIL CODE SECTION 3479, *ET SEQ.*; BUS. & PROF. CODE SECTION 17200, *ET SEQ.*]

[Unlimited Action]

PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

I. INTRODUCTION

1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the State of California ("Plaintiff" or "People"), for the purpose of abating and enjoining a dangerous gang-, firearm-, and narcotics-related public nuisance existing at single family residence located at 4829 Avalon Blvd., Los Angeles, CA 90011 (the "Property"). The Property is a hub for gang-related criminal and violent activity perpetrated by members and associates of the Playboys street gang (the "Playboys"). In the past year, the Property has been the site of five documented shootings, including a murder, and rampant illegal sales of

1 dangerous firearms and methamphetamine. The Property is in close proximity to several
2 sensitive sites in the community, including a large public park, two schools, and several
3 churches, including Ebenezer Baptist Church, which is located directly across the street.

4 2. The Playboys are a criminal street gang notorious for narcotics sales, firearms
5 sales, drive-by shootings, assaults, and murder. One of their most active areas is in South Los
6 Angeles – from San Pedro Street to the west to Central Avenue to the east, and from Vernon
7 Avenue to the north to Slauson Avenue to the south. The Property is one of the Playboys'
8 main strongholds in this turf.

9 3. Playboys members and their associates freely engage in criminal and violent
10 behavior at the Property. This activity includes selling illegal narcotics and firearms,
11 committing shootings, and assaulting rival gang members and others in the community. On a
12 daily basis, Playboys members and their associates drink, smoke, and otherwise congregate
13 at the Property and in the large parking lot on the Property, making it a prime target for
14 shootings by rival gangs. Some of the recent violence emanating from the Property includes
15 the following, without limitation:

- 16 • In March 2017, two individuals in the parking lot of the Property opened fire on a truck
17 carrying rival gang members that had been circling the Property, striking at least one
18 of the occupants in the leg.
- 19 • In December 2016, in the middle of the day, two individuals in the parking lot of the
20 Property opened fire on a vehicle that was passing the Property along Avalon
21 Boulevard.
- 22 • In October 2016, as two individuals were “hanging out” in the parking lot of the
23 Property, a truck approached and occupants opened fire on the individuals, firing
24 approximately 5 to 6 bullets.
- 25 • In September 2016, an individual standing directly in front of the Property was
26 confronted and shot to death by an assailant.
- 27 • In July 2016, an individual sitting on the front porch of the house at the Property was
28 shot in the leg after assailants opened fire on the Property, firing approximately 6

1 bullets.

2 The gang's violent activities at the Property, and the consequences of those activities, come at
3 the expense of the safety and well-being of the community at large.

4 4. The criminal – and deadly – activity at the Property has led to countless criminal
5 investigations and arrests by the Los Angeles Police Department ("LAPD") in recent years.
6 Additionally, the Property has been the center of a federal law enforcement investigation into
7 the Playboys' illegal firearms and narcotics sales activity. From December 2016 to April 2017,
8 law enforcement agents conducted six controlled purchases of illegal firearms and
9 methamphetamine at the Property, resulting in the sale of 20 illegal firearms, 3 silencers, 122
10 grams of methamphetamine, and the subsequent arrest of four individuals connected to the
11 sales. Despite the recent arrests, the gang's presence at the Property persists.

12 5. The Property is notorious in the surrounding community and amongst LAPD
13 officers as a dangerous and troublesome gang location. The Property fosters and augments
14 the Playboys' hold on the surrounding area by serving as a hospitable location to further the
15 gang's commercial operations. Not every building within a gang's turf is available for
16 exploitation by the gang, as most are managed better, more physically fortified, and lack gang
17 "friendlies" that attract gang members in the first place, among other things. The properties
18 that do fall under the grip of a gang, however – such as the Property complained of herein –
19 are not managed effectively and become toxic to the people in their vicinity.

20 **II. THE PARTIES AND THE PROPERTY**

21 A. **Plaintiff**

22 7. Plaintiff, the People, is the sovereign power of the State of California, and is
23 authorized to bring the first cause of action pursuant to the Narcotics Abatement Law ("NAL"),
24 Health and Safety Code section 11571, et seq.; the second cause of action pursuant to
25 California Code of Civil Procedure section 731, which authorizes abatement, injunction, and
26 penalty of and for public nuisances pursuant to the Public Nuisance Law ("PNL"), California
27 Code sections 3479-3480; and the third cause of action pursuant to California Business and
28 Professions Code section 17204, which authorizes cities with a population in excess of

1 750,000, such as Los Angeles, to prosecute actions for relief under California Business and
2 Professions Code section 17200, *et seq.* for unlawful competition.

3 **B. Defendant**

4 8. Defendant Ebenezer Baptist Church (the "Defendant"), a California Corporation,
5 has owned the Property since 1999.

6 9. The true names and capacities of defendants sued herein as DOES 1 through
7 50, inclusive, are unknown to the Plaintiff, who therefore sues said defendants by such
8 fictitious names. When the true names and capacities of said defendants have been
9 ascertained, the Plaintiff will ask leave of the Court to amend this complaint and to insert in lieu
10 of such fictitious names the true names and capacities of said fictitiously named defendants.

11 **C. The Property**

12 10. The Property is a single family residence with a large parking lot legally
13 described as: "Lot 4 and the South 5 feet of Lot 3 of Metzler & Hunt's South Park Tract as per
14 Map recorded in Book 6, Page 29 of Maps, in the Office of the County Recorder of Los
15 Angeles County, California." The Los Angeles County Assessor's Parcel Number for the
16 Property is 5109-020-003. A photograph of the Property is attached hereto as Exhibit 1.

17 11. The Property is approximately 170 feet from South Park Recreation Center, 530
18 feet from Dr. Maya Angelou High School, and 600 feet away from 49th Street Elementary
19 School. Several churches are located nearby, including Defendant's church, which is located
20 directly across the street from the Property. A map showing the location of the Property in
21 relation to these sensitive sites is attached hereto as Exhibit 2.

22 **III. THE PUBLIC NUISANCE LAW**

23 12. The PNL, Civil Code section 3479, defines a public nuisance as "[a]nything which
24 is injurious to health, including, but not limited to, the illegal sale of controlled substances, or is
25 indecent or offensive to the senses, or an obstruction to the free use of property, so as to
26 interfere with the comfortable enjoyment of life or property...." (See *City of Bakersfield v. Miller*
27 (1966) 64 Cal.2d 93, 99 ["The Legislature has defined in general terms the word 'nuisance' in
28 Civil Code section 3479. . . ."].)

1 13. Civil Code section 3480 defines a public nuisance as "one which affects at the
2 same time an entire community or neighborhood, or any considerable number of persons,
3 although the extent of the annoyance or damage inflicted upon individuals may be unequal."

4 14. The case law is "replete with examples" of the "threat violent street gangs ...
5 pose to the safety of peaceful Californians." (*Castaneda v. Olsher* (2007) 41 Cal.4th 1205,
6 1216.) In a case involving gang-related gunfire similar to what is occurring at the Property
7 here, the California Supreme Court explicitly recognized that "[s]treet gang activity can often
8 subject" innocent bystanders "to unacceptable levels of risk." (*Id.*) In *Medina v. Hillshore
9 Partners* (1995) 40 Cal.App.4th 477, 486, involving a wrongful death claim by the mother of a
10 young man shot by gang members at an apartment complex, the Court said, "We agree that
11 the congregation of gangs poses a foreseeable risk of harm to the public." In particular, the
12 whole spectrum of typical street gang conduct, ranging from loitering, to public drinking and
13 boisterousness, to drug dealing, to gunfire, has been held to "easily meet the statutory
14 standard" for a public nuisance under Civil Code section 3479. (*People ex rel. Gallo v. Acuna*
15 (1997) 14 Cal.4th 1090, 1120.)

16 15. Civil Code section 3491 provides the methods by which public nuisances such as
17 those alleged herein may be abated. Civil Code section 3491 states that the "remedies
18 against a public nuisance are indictment or information, a civil action or abatement."
19 Abatement is "accomplished by a court of equity by means of an injunction proper and suitable
20 to the facts of each case." (*Sullivan v. Royer* (1887) 72 Cal. 248, 249.)

21 16. Code of Civil Procedure section 731 authorizes a city attorney to bring an
22 action to enjoin or abate a public nuisance. It provides, in relevant part, "[a] civil action may be
23 brought in the name of the people of the State of California to abate a public nuisance . . . by
24 the city attorney of any town or city in which such nuisance exists."

25 17. "[S]trict liability for nuisance historically attends the possession and control of
26 land." (*Leslie Salt Co. v. San Francisco Bay Conservation and Development Commission*
27 (1984) 153 Cal.App.3d 605, 618 n. 15 & 619). "It is immaterial whether the acts" of the
28 persons sought to be held liable for a nuisance "be considered willful or negligent; the essential

fact is that, whatever be the cause, the result is a nuisance." (*Snow v. Marian Realty Company* (1931) 212 Cal. 622, 625-26; see also *Sturges v. Charles L. Harney, Inc.* (1958) 165 Cal.App.2d 306, 318 ["a nuisance and liability therefore may exist without negligence"]; *People v. McCadden* (1920) 48 Cal.App. 790, 792 ["A judgment supported on findings that such nuisance was conducted and maintained on the premises in question, regardless of the knowledge of the owner thereof, is sufficient. Such knowledge on the part of the owner . . . is unnecessary."].) This strict standard is because "the object of the act is not to punish; its purpose is to effect a reformation of the property itself." (*People v. Bayside Land Co.* (1920) 48 Cal.App. 257, 261.)

IV. THE NARCOTICS ABATEMENT LAW

18. Since its enactment in 1972, the principal purpose of the NAL (Health & Saf. Code, § 11570, *et seq.*) is the abatement of buildings and places "used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled substance, precursor, or analog specified in this division . . ." (Health & Saf. Code, § 11570).

19. The NAL provides that every building or place used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled substance, precursor, or analog *inter alia*, "is a nuisance which **shall** be enjoined, abated, and prevented . . . whether it is a public or private nuisance." (Health & Saf. Code, § 11570 [emphasis added]; *People ex rel Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew v. Superior Court* (1993) 20 Cal.App.4th 866, 870-871.)

20. Health and Safety Code section 11571 authorizes a city attorney to bring an action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part: "Whenever there is reason to believe that a nuisance as described in Section 11570 is kept, maintained, or exists in any county, the district attorney of the county, or the city attorney of any incorporated city or of any city and county, in the name of the people, may . . . maintain an action to abate and prevent the nuisance and perpetually to enjoin the person conducting or maintaining it, and the owner, lessee, or agent of the building or place in or upon which the nuisance exists from directly or indirectly maintaining or permitting the nuisance."

1 21. Health and Safety Code section 11573(a) provides that: "If the existence of the
2 nuisance is shown in the action to the satisfaction of the court or judge, either by verified
3 complaint or affidavit, the court or judge **shall** allow a temporary restraining order or injunction
4 to abate and prevent the continuance or recurrence of the nuisance." (Emphasis added.) In
5 addition, Health and Safety Code section 11581 provides, as an additional remedy, for the
6 removal and sale of all fixtures and movable property on the premises used in aiding or
7 abetting the nuisance and for the closure of the building for up to one year.

8 **V. UNFAIR COMPETITION LAW**

9 22. The practices forbidden by the state Unfair Competition Law at Business and
10 Professions Code section 17200, *et seq.* ("UCL") are any business practices forbidden by law,
11 be it criminal, federal, state, municipal, statutory, regulatory or court-made. As the California
12 Supreme Court has explained, the UCL "borrows' violations of other laws and treats them as
13 unlawful practices independently actionable under Section 17200, *et seq.*" (*South Bay*
14 *Chevrolet v. General Motors Acceptance Corp.* (1999) 72 Cal.App.4th 861, 880 (internal
15 citations and quotation marks omitted).)

16 23. As proscribed by the UCL, "[a]n 'unlawful business activity' includes anything that
17 can properly be called a business practice and that at the same time is forbidden by law."
18 (*People v. McKale* (1979) 25 Cal.3d 626, 632.) The ownership and operation of a rental single
19 family residence, such as the Property, by nonresident owners doing so for the purposes of
20 profit, is, axiomatically, a business under the UCL. (See *People ex. rel. City of Santa Monica v.*
21 *Gabriel* (2010) 186 Cal.App.4th 882, 888 ["The renting of residential housing is a business."].)
22 Thus, when a property owner conducts, maintains or permits a nuisance that is unlawful under
23 the PNL and NAL to exist on the premises of such a property, it is a violation of the UCL.

24 24. Moreover, the UCL casts a broad net. "Any person performing or proposing to
25 perform an act of unfair competition may be enjoined . . ." (Bus. & Prof. Code, § 17203.) The
26 term person includes "natural persons, corporations, firms, partnerships, joint stock
27 companies, associations and other organizations of persons." (Bus. & Prof. Code, § 17201.)
28 The courts have expanded Section 17200's net beyond direct liability to include common law

1 doctrines of secondary liability where the liability of each defendant is predicated on his or her
2 personal participation in the unlawful practices. (*People v. Toomey* (1985) 157 Cal.App.3d 1,
3 14; *Emery v. Visa Int'l Service Ass'n* (2002) 95 Cal.App.4th 952, 960.)

4 25. A public entity can sue pursuant to Section 17200 based on violations of its own
5 municipal code, state law, or other local ordinance. (*People v. Thomas Shelton Powers, M.D.,*
6 *Inc.* (1992) 2 Cal.App.4th 330, 338-339.)

7 26. Defendants engaging in violations of the UCL may be enjoined in any court of
8 competent jurisdiction. (Bus. & Prof. Code, § 17203.) A court may make such orders or
9 judgments, including appointment of a receiver, as may be necessary to prevent the use or
10 employment by any person of any practice constituting unfair competition. (*Id.*)

11 **VI. FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

12 **[Health and Safety Code section 11570, et seq. --**

13 **Against Defendant and DOES 1 through 50]**

14 27. Plaintiff hereby incorporates by reference paragraphs 1 through 26 of this
15 Complaint and makes them part of the First Cause of Action, as if fully set forth herein.

16 28. The Property has been used, from an exact date unknown, and is *currently* being
17 used, for the purposes of unlawfully selling, serving, storing, keeping, manufacturing, or giving
18 away controlled substances in violation of Health and Safety Code section 11570, et seq.
19 Further, the Property's community reputation is as a narcotics sales location.

20 29. Defendant, and DOES 1 through 50, are responsible for conducting, maintaining,
21 and/or directly or indirectly permitting the nuisance as alleged herein. Plaintiff has no plain,
22 speedy, and adequate remedy at law and unless Defendant, and DOES 1 through 50, are
23 restrained and enjoined by order of this Court, they will continue to use, occupy, and maintain,
24 and/or aid, abet, or permit, directly or indirectly, the use, occupation, and maintenance of the
25 Property, together with the fixtures and appurtenances located therein, for the nuisance
26 complained of herein, to the great and irreparable damage of the public and in violation of
27 California law.

28 ///

1 **VII. SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

2 **[Civil Code section 3479, et seq. --**

3 **Against All Defendants and DOES 1 through 50]**

4 30. Plaintiff incorporates by reference Paragraphs 1 through 29 of this Complaint and
5 makes them part of this Second Cause of Action as though fully set forth herein.

6 31. From an exact date unknown through the present time, Defendant, and DOES 1
7 through 50, have alternately owned, operated, managed, and used, and/or directly or indirectly
8 permitted to be occupied and used, the Property in such a manner as to constitute a public
9 nuisance in accordance with Civil Code sections 3479 and 3480. The public nuisance, as
10 described herein, is injurious to health, indecent or offensive to the senses, and/or an
11 obstruction to the free use of property, so as to substantially and unreasonably interfere with
12 the comfortable enjoyment of life or property by those persons living in the surrounding
13 community. The public nuisance at the Property consists of, but is not limited to, narcotics and
14 firearm sales at the Property; the regular, menacing, intimidating, disorderly, and violent
15 presence of resident and non-resident gang members and/or associates at and around the
16 Property; and the occurrence of gun violence on, around, and in connection with the Property.

17 32. Defendant, and DOES 1 through 50, in owning, conducting, maintaining, and/or
18 permitting the use of the Property, directly or indirectly, as a public nuisance, have engaged in
19 wrongful conduct and caused a serious threat to the general health, safety, and welfare of the
20 law-abiding tenants at the Property and persons in the area surrounding the Property.

21 33. Unless Defendant, and DOES 1 through 50, are restrained and enjoined by order
22 of this Court, they will continue to use, occupy, and maintain, and to aid, abet, or permit,
23 directly or indirectly, the use, occupation, and maintenance of the Property, together with the
24 fixtures and appurtenances located therein, for the purpose complained of herein, to the great
25 and irreparable damage of Plaintiff and in violation of California law.

26 **VIII. THIRD CAUSE OF ACTION FOR UNFAIR COMPETITION**

27 **[Business and Professions Code Section 17200, et seq. --**

28 **Against All Defendants and DOES 1 through 50]**

34. Plaintiff hereby incorporates by reference paragraphs 1 through 33 of this Complaint and makes them part of this Third Cause of Action, as if fully set forth herein.

35. Ownership and operation of the Property is a business. When the owner and/or manager of such a business violates the NAL and/or PNL such that a nuisance exists and flourishes at the business' premises, as alleged herein, it is also a violation of the UCL.

36. Defendant, and DOES 1 through 50, have violated the UCL by conducting, maintaining and/or permitting, directly or indirectly, a nuisance in violation of the NAL and/or the PNL, at the Property, as alleged herein.

37. Plaintiff has no adequate remedy at law, and unless Defendant, and DOES 1-50, are restrained by this Court they will continue to commit unlawful business practices or acts, thereby causing irreparable injury and harm to the public's welfare.

PRAYER

**WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND
DECREE AS FOLLOWS:**

AS TO THE FIRST CAUSE OF ACTION:

AS TO DEFENDANT and DOES 1 through 50:

1. That each Defendant, and the Property, including all building and structures thereon, be declared in violation of Health and Safety Code section 11570, et seq.

2. That the Property, together with the fixtures and moveable property therein and thereon, be found to constitute a public nuisance and be permanently abated as such in accordance with section 11581 of the California Health and Safety Code.

3. That the Court grant a preliminary injunction, permanent injunction and order of abatement in accordance with Section 11570, et seq., of the California Health and Safety Code, enjoining and restraining each Defendant, and any agents, officers, employees, and anyone acting on their behalf, from unlawfully selling, serving, storing, keeping, manufacturing, or giving away controlled substances on the Property, and/or directly or indirectly maintaining or permitting such nuisance activity.

4. That the Court order physical and managerial improvements to the Property in

1 accordance with Health and Safety Code section 11573.5, and such orders as are otherwise
2 appropriate, to remedy the nuisance on the Property and enhance the abatement process,
3 including but not limited to, the following: an internet-connected video monitoring system
4 accessible by LAPD; improved lighting; sufficiently secure gating and fencing; improved tenant
5 screening and lease enforcement procedures; and armed, licensed security guards.

6 5. That as part of the Judgment, an Order of Abatement be issued, and that the
7 Property be closed for a period of one year, not to be used for any purpose, and be under the
8 control and custody of this Court for said period of time; or, in the alternative, if the Court
9 deems such closure to be unduly harmful to the community, that Defendant pay an amount of
10 damages equal to the fair market rental value of the Property for one year to the City of Los
11 Angeles in accordance with Health and Safety Code section 11581 subdivision (c)(1).

12 6. That each Defendant be assessed a civil penalty in an amount not to exceed
13 twenty-five thousand dollars (\$25,000.00) each.

14 7. That all fixtures and moveable property used in conducting, maintaining, aiding,
15 or abetting the nuisance at the Property be removed by the LAPD and sold in the manner
16 provided for the sale of chattels under execution. Said fixtures and property shall be
17 inventoried and a list prepared and filed with this court.

18 8. That there shall be excepted from said sale, such property to which title is
19 established in some third party not a defendant, nor agent, officer, employee, or servant of any
20 defendant in this proceeding.

21 9. That the proceeds from said sale be deposited with this court for payment of the
22 fees and costs of sale. Such costs may occur in removal of said property and in closing said
23 Property and keeping it closed.

24 10. That if the proceeds of the sale do not fully discharge all such costs, fees and
25 allowances, the Property shall also be sold under execution issued upon the order of the court
26 or judge and the proceeds of such sale shall be applied in a like manner. That any excess
27 monies remaining after payment of approved costs shall be delivered to the owner of said
28 Property. Ownership shall be established to the satisfaction of this court.

1 11. That each Defendant, and any agents, trustees, officers, employees and anyone
2 acting on their behalf, and their heirs and assignees, be perpetually enjoined from transferring,
3 conveying, or encumbering any portion of the Property, for consideration or otherwise, without
4 first obtaining the Court's prior approval.

5 12. That each Defendant be ordered to immediately notify any transferees,
6 purchasers, commercial lessees, or other successors in interest to the subject Property of the
7 existence and application of any temporary restraining order, preliminary injunction, or
8 permanent injunction to all prospective transferees, purchasers, commercial lessees, or other
9 successors in interest, *before* entering into any agreement to sell, lease or transfer the
10 Property, for consideration or otherwise, all or any portion of the Property that is the subject of
11 this action.

12 13. That each Defendant be ordered to immediately give a complete, legible copy of
13 any temporary restraining order and preliminary and permanent injunctions to all prospective
14 transferees, purchasers, lessees, or other successors in interest to the Property.

15 14. That each Defendant be ordered to immediately request and procure signatures
16 from all prospective transferees, purchasers, lessees, or other successors in interest to the
17 subject Property, which acknowledges his/her respective receipt of a complete, legible copy of
18 any temporary restraining order, preliminary and permanent injunction, and deliver a copy of
19 such acknowledgment to the Los Angeles City Attorney's Office, c/o Deputy City Attorney
20 Adam Bierman or his designee.

21 15. That Plaintiff recover the costs of this action, including law enforcement
22 investigative costs and any fees, including attorneys' fees, authorized by law, not to exceed
23 \$1,000,000.00, from Defendants.

24 AS TO THE SECOND CAUSE OF ACTION

25 AS TO DEFENDANT and DOES 1 through 50:

26 1. That the Property, together with the fixtures and moveable property therein and
27 thereon, be declared a public nuisance and be permanently abated as such in accordance with
28 Civil Code section 3491.

1 2. That each Defendant, and any agents, officers, employees, and anyone acting
2 on their behalf, and their heirs and assignees, be preliminarily and perpetually enjoined from
3 operating, conducting, using, occupying, or in any way permitting the use of the Property as a
4 public nuisance. Such orders should include, but not be limited to physical and managerial
5 improvements to the Property and such other orders as are appropriate to remedy the
6 nuisance on the Property and enhance the abatement process.

7 3. That Plaintiff be awarded such costs as may occur in abating said nuisance at
8 the Property and such other costs as the Court shall deem just and proper.

9 4. That Plaintiff be granted such other and further relief as the Court deems just and
10 proper, including closure and/or demolition of the Property.

11 AS TO THE THIRD CAUSE OF ACTION

12 AS TO DEFENDANT and DOES 1 through 50:

13 1. That each Defendant be declared in violation of Business and Professions Code
14 section 17200.

15 2. That each Defendant, and any agents, heirs, successors, and anyone acting on
16 their behalf, be permanently enjoined from maintaining, operating, or permitting any unlawful or
17 unfair business acts or practices in violation of Business and Professions Code section 17200.

18 3. That the Court grant a preliminary and/or permanent injunction prohibiting each
19 Defendant, and any agents, heirs, successors, and anyone acting on their behalf, from
20 engaging in the unlawful or unfair acts and/or practices described herein at the Property and in
21 the City of Los Angeles. Such orders should include physical and managerial improvements to
22 the Property.

23 4. That, pursuant to Business and Professions Code section 17206, each
24 Defendant be assessed a civil penalty of Two Thousand Five Hundred Dollars (\$2,500) for
25 each and every act of unfair competition.

26 5. That, pursuant to the Court's equitable power and Business and Professions
27 Code section 17203, the Court make such orders or judgments, including appointment of a
28 receiver, to eliminate the unfair competition alleged herein.

1 AS TO ALL CAUSES OF ACTION

2 1. That Plaintiff recover the amount of the filing fees and the amount of the fee for
3 the service of process or notices that would have been paid but for Government Code section
4 6103.5, designating it as such. The fees may, at the Court's discretion, include the amount of
5 the fees for certifying and preparing transcripts.

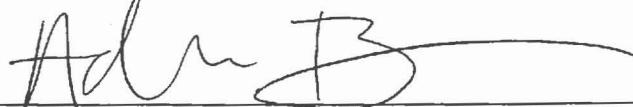
6 2. That Plaintiff be granted such other and further relief as the Court deems just and
7 proper.

8
9 DATED: June 12, 2017

Respectfully submitted,

10 MICHAEL N. FEUER, City Attorney

11 JONATHAN CRISTALL, Supervising Assistant City Attorney

12 By: 

13 ADAM BIERMAN, Deputy City Attorney

14 Attorneys for Plaintiff, THE PEOPLE OF THE STATE
15 OF CALIFORNIA

EXHIBIT 1

Exhibit 1 - 4829 Avalon Blvd.

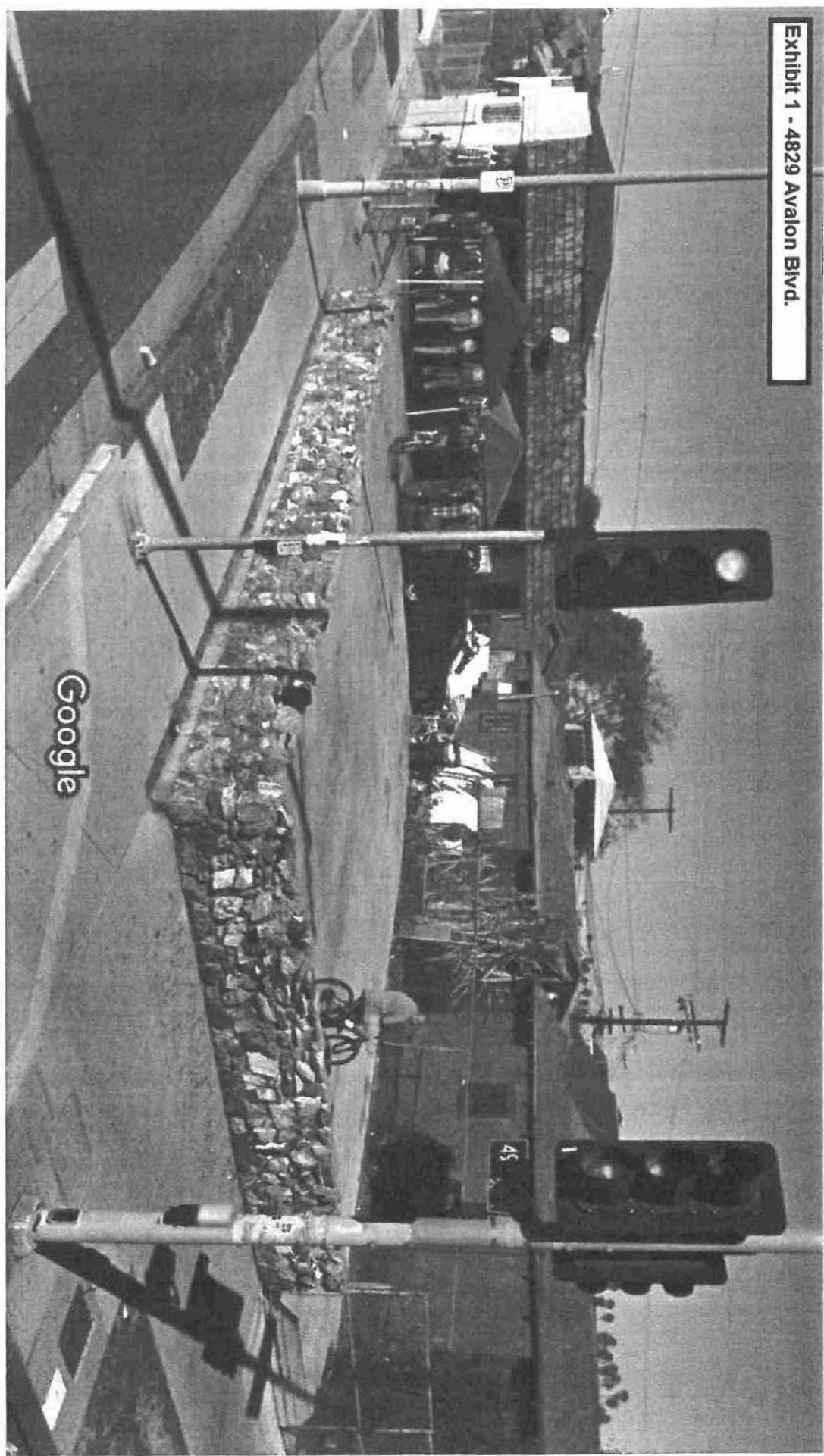
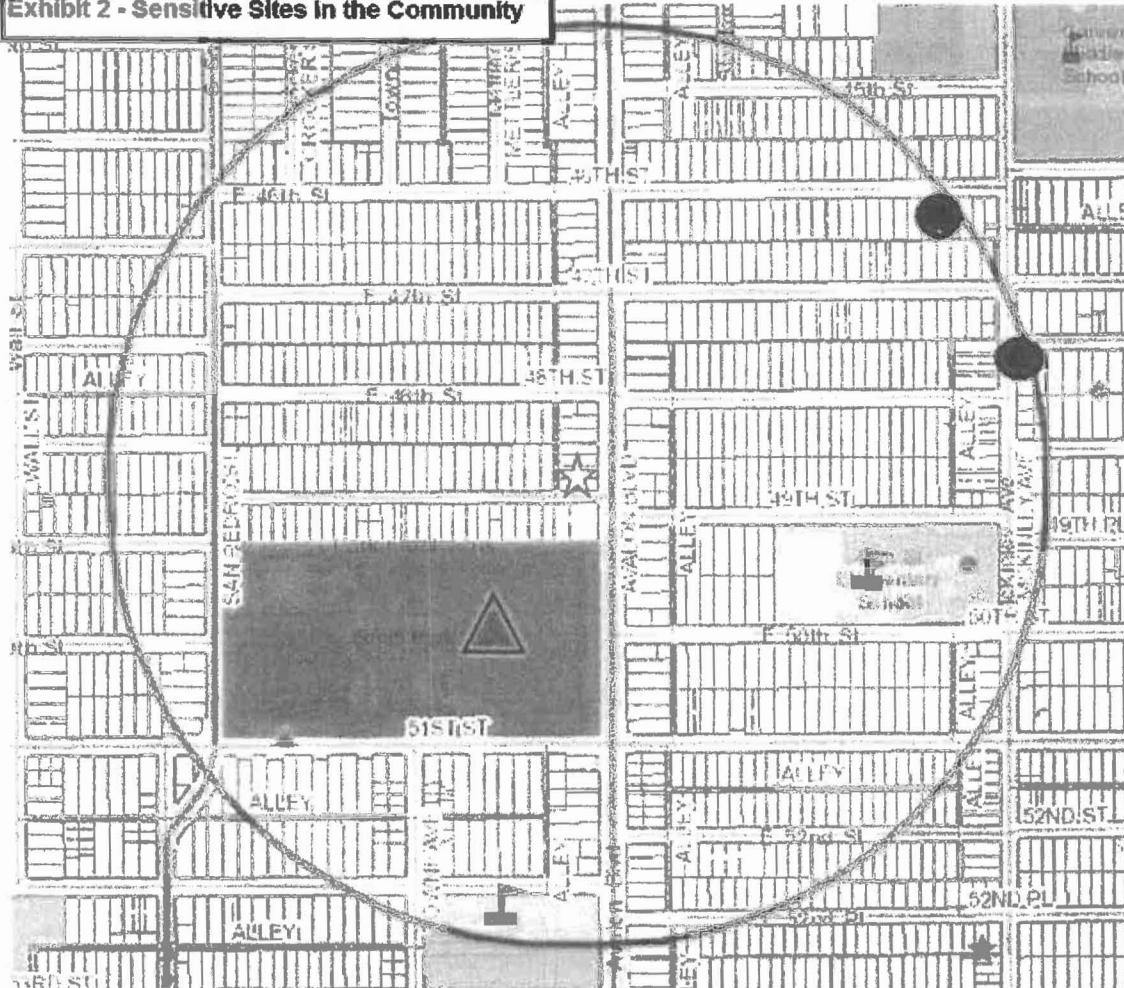


EXHIBIT 2

Exhibit 2 - Sensitive Sites in the Community



= 1500 ft RADIUS

★ = 4829 Avalon Boulevard

= SCHOOLS

Angelou High School at 300 E 53rd Street
(approx. 524 ft away)

49th Street Elementary School at 750 E 49th Street
(approx. 599 ft away)

= RECREATION & PARKS

South Park Recreation Center at 345 E 51st Street
(approx. 168 ft away)

= CHURCHES

McCoy Memorial Baptist Church at 802 46th Street
(approx. 1375 ft away)

Victory Baptist Church at 4802 McKinley
(approx. 1447 ft away)